

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION

CASE NO. 00-6027-CR-ZLOCH  
Magistrate Judge Seltzer

UNITED STATES OF AMERICA,  
Plaintiff,

v.

JOHNNIE POWELL,

Defendant.

NIGHT BOX  
FILED  
MAR 28 2000  
CLARENCE MADDOX  
CLERK, USDC SD-FLA

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**DEFENDANT'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE PRE-TRIAL MOTIONS**

COMES NOW the defendant, Johnnie Powell, by and through his undersigned attorney, and files his Unopposed Motion For Extension of Time To File Pre-Trial Motions, and states as follows:

1. The above-styled matter was set for trial on March 27, 2000. On March 27, 2000, Judge Zloch granted the defendant's motion for continuance and continued the case to a date to be determined. The defendant had requested a continuance of at least sixty (60) days.

2. The defendant is charged in a multi-count indictment with tax evasion. The discovery provided to date is relatively voluminous. Additional time is necessary to review the discovery and to discuss it fully with the defendant. Additional time also is necessary to research the issues that are ripe for potential pre-trial motions and then to prepare the motions.

3. Magistrate Judge Seltzer granted a previous request for an extension of time to file pre-trial motions up to the date of the calendar call, indicating that the defendant could renew the motion and request additional time if Judge Zloch granted the motion to continue. As Judge Zloch

*[Handwritten signature]*  
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has continued the case, the undersigned respectfully requests an additional 31 days within which to file pre-trial motions, rendering said motions due by April 21, 2000. Substantial involvement in the preparation of several appellate briefs in the Eleventh Circuit has left the undersigned unable to expend the time necessary to prepare the pre-trial motions in this case.

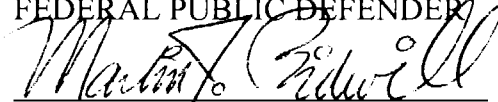
5. AUSA Robin Rosenbaum has advised that she has no objection to the Court granting the motion.

WHEREFORE the defendant prays that the Court extend the time for filing pre-trial motions by 31 days so that the motions are due by April 21, 2000.

Respectfully submitted,

KATHLEEN M. WILLIAMS  
FEDERAL PUBLIC DEFENDER

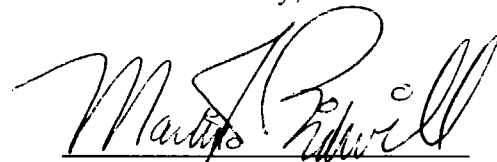
By:



Martin J. Bidwill  
Assistant Federal Public Defender  
Attorney for Defendant  
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the aforementioned motion was mailed on this 29<sup>th</sup> day of March, 2000, to Robin Rosenbaum, Assistant United States Attorney, 500 East Broward Boulevard, Suite 700, Fort Lauderdale, Florida 33394.

  
Martin J. Bidwill